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JULIUS MEL REICH  
(1933 - 2000)

October 28, 2003

Lawrence H. Norton, General Counsel  
Tom Anderson, Esq.  
Federal Election Commission  
Washington, DC 20463

Re: Chris Kouri for Congress Committee and William Shaia  
Its Treasurer  
MUR 5328

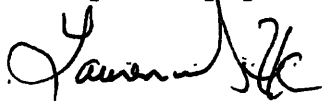
Dear Messrs. Norton and Anderson:

Enclosed please find the declaration of William H. Shaia, Jr., the former treasurer of the referenced Committee. As this declaration further demonstrates, no one connected with the Committee had any information which would lead the Committee to believe that it was inappropriate to retain both of the contributions in question. Moreover, once the Committee became aware, from Commission-provided documents, that it was arguable that the contributors were related, a check disgorging the excess contribution was issued at once.

In these circumstances, the Committee respectfully suggests that the investigation be concluded and the MUR be closed without any further administrative action.

Again, as with some of the other declarations, I will forward the original signature page from this declaration as soon as I receive it.

Very truly yours,



Laurence S. Zakson  
of REICH, ADELL, CROST & CVITAN  
Enclosure  
cc: Chris Kouri  
105559

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
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5 Attorneys for Responding Party

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8 Before the United States Government  
9 Federal Election Commission  
10

11 In Re: ] CASE NO. MUR 5328  
12 Chris Kouri for Congress ]  
Committee & William ] DECLARATION OF WILLIAM H. SHAIA,  
13 Shaia, Its Treasurer ] JR.  
14 ]  
15 ]  
16 ]

17 I, WILLIAM H. SHAIA, JR., declare:  
18

19 1. [Identification]  
20

21 I am a tax attorney and was the volunteer treasurer for Chris  
22 Kouri for Congress Committee (Committee). My work for this  
23 Committee was my first time to work on a campaign of a candidate  
24 for federal office. I served as treasurer for the Committee from  
25 its inception through September 16, 2003. I viewed my role as  
26 essentially titular. I filed the IRS Form SS-4 and signed some  
27 additional FEC forms brought to me by Paul Blank, which Mr. Blank  
28 represented were necessary to get the Committee up and running. I

1 also signed a number of FEC campaign finance reports. All of the  
2 facts set forth in this declaration are based on my own personal  
3 knowledge unless otherwise expressly noted.

4  
5 2. [Solicitation of Contribution Checks]  
6

7 I played no role in the solicitation of contribution checks,  
8 except that I made a contribution to Committee from my own  
9 personal funds. I never saw any call lists used by the Committee  
10 to solicit funds, and I was not consulted in connection with any  
11 written solicitations of contributors.

12  
13 3. [Processing of Contribution Checks]  
14

15 I played no role in the processing or review of contribution  
16 checks, except to sign the ultimate FEC report prepared by the  
17 Committee and its outside vendor, Durkee and Associates.


18  
19 It was my understanding that Paul Blank and Durkee and  
20 Associates performed the Federal Election Campaign Act compliance  
21 functions for the Committee. At no time did they seek any  
22 guidance from me with respect to specific contributions.

23  
24 4. [Team Majority and PAC to the Future]  
25

26 No one from either PAC to the Future or Team Majority  
27 contacted me or, to my knowledge, Messrs. Blank or Kouri at all,  
28 other than the sending of their respective checks. Thus, there

1 was nothing of which I was aware to indicate that the two  
2 committees are or were in any way connected.

3  
4 I declare under penalty of perjury under the laws of the  
5 United States of America that the foregoing is true and correct to  
6 the best of my knowledge and information, and that this  
7 declaration was executed this 25<sup>th</sup> day of October, 2003 in  
8 Charlotte, NC.

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11 WILLIAM H. SHAIJA, JR.  
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